

EXHIBIT 9

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August 12, 2004

Via Facsimile

Kathleen J. Hill, Esq.
Law Office of Kathleen J. Hill
92 State Street, Suite 700
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617-742-4508 (fax)

Re: Griffith v. OneBeacon Insurance Company, et. al.
U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Kathleen:

I write with regard to the subpoena *duces tecum* served upon William Queenan.

Despite several conversations with Mr. Queenan and his careful review of the Complaint in the above referenced matter, Mr. Queenan continues to state that he has no knowledge of matters relevant to this litigation. Moreover, Mr. Queenan has no memory of his participation in matters addressing Ms. Griffith or her tenure with CGU/OneBeacon Insurance. Accordingly, Mr. Queenan is not a qualified witness for defendant companies OneBeacon Insurance Company and OneBeacon America Insurance Company.

Should you believe that Mr. Queenan is an appropriate witness, please produce copies of the documents in your possession that evidence such, including the documents you referenced in past conversations which contain either Mr. Queenan's name or signature. Upon evidence that Mr. Queenan does have relevant knowledge, Defendants will reconsider their opposition to his deposition.

Were Defendants to agree to Mr. Queenan's deposition, the subpoena *duces tecum* served upon him is both grossly overbroad and wholly inappropriate. As such, Defendants object to it

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and state that were Mr. Queenan's deposition to be taken, the eight categories of documents you subpoenaed would not be produced. Should you resubmit your request in the form of a request for production of documents, Defendants' would revisit the appropriateness of your requests at that time.

Should you have any questions or concerns, please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read 'Leah M. Moore', with a long horizontal flourish extending to the right.

Leah M. Moore

cc: William Queenan
Joan K. Geddes, Esq.
Keith B. Muntyan, Esq.